

ITEM: AT&T 3-24 Separately for each of the most recent 12 months, please provide Performance Measurements Results Reports (*aka* performance metrics results reports) for CLECs in the aggregate for VZ-VA hot-cut provisioning process over the past 12 months, including but not limited to internal draft memos and spreadsheets in both paper and electronic medium where available. If available, please provide a disaggregated version of this report by anonymous CLEC (e.g. CLEC A, CLEC B, CLEC C, CLEC D, etc.).

REPLY: See General Objections.

VZ VA #107

ITEM: AT&T 3-25 Has an independent and unaffiliated third party reviewed VZ-VA's manual hot-cut processes and performance? If so, what were the results and conclusions? Provide any documents and/or reports provided by the third party review, including summary and back-up information, data, and analysis supporting any and all conclusions.

REPLY: See General Objections.

VZ VA #108

ITEM: AT&T 3-26 What is the average number of lines that are involved in a hot cut order? Please provide all information regarding the method used to calculate the average (e.g. by unique end user and by unique end user location). Does Verizon have any basis to make the statement that hot cut orders for three or less lines are placed for customers having a total of three or less lines (as Verizon applies the definition of customer for application of the ULS limitation)? If so, describe how Verizon made this determination. Limiting consideration to only instances where a hot cut has occurred, provide any data that supports Verizon's conclusions regarding how many lines in total and at a single location a particular customer might have that experienced a hot cut.

REPLY: See General Objections,

VZ VA #109

ITEM: AT&T 3-27 Can a CLEC that provides voice service using UNE-P re-use the customer's existing loop to provide both voice and advanced services using a line splitting arrangement? If no, please explain why not. If yes, please respond to the following:

- (A) Does Verizon have, either in place or planned, either manual or mechanized procedures that will permit a carrier employing UNE-P to add DSL capabilities in the HFS of the loop employed in the UNE-P? If so, please describe individually for each OSS process how non-discriminatory support can now be delivered for pre-ordering, ordering, provisioning, maintenance and billing compared to the processes used to support line sharing.
 - (i) If such processes are not currently operational, please state when such processes are expected to be available.
 - (ii) To the extent manual processes are or will be provided for any of these functions, **identify** for each whether Verizon has plans to mechanize the processes and, if so, when the mechanized process will be delivered.
- (B) Does the described or planned provisioning process involve any potential interruption of the customer's existing retail voice service when the additional service is added in the HFS of that loop? If not, please explain why not. If so, please provide a detailed response to the following:
 - (1) At what point in the provisioning process might or will the service be interrupted and why?
 - (2) How long does Verizon expect such an interruption to last and what performance commitments will Verizon make with regard to the maximum and average interruption of service?

REPLY: See General Objections.

VZ VA #110

ITEM: AT&T 3-28 When Verizon provisions a line sharing arrangement for a loop on which local voice service is already operating, must the existing retail service be interrupted in order to add service in the High Frequency Spectrum of that loop? If no, please explain why not. If so, please provide a detailed response to the following:

(A) Does the described or planned provisioning process involve any potential interruption of the customer's existing retail voice service when the additional service is added in the HFS of that loop? If not, please explain why not. If so, please provide a detailed response to the following:

(1) At what point in the provisioning process might or will the service be interrupted and why?

(2) How long does Verizon expect such an interruption to last and what performance commitments will Verizon make with regard to the maximum and average interruption of service?

(B) If Verizon has measured the service interruption interval for line sharing configurations, please respond to the following questions:

(1) What is the mean duration of the service interruption?

(2) What is the standard error of the estimate and the number of observations used to calculate the mean duration of the service interruption?

(3) Is the mean duration of the service interruption different for VADI and other carriers collectively?

(i) If so, state the results for (a) and (b) above separately.

(ii) If a separate evaluation of results for VADI and other carriers has not been made, explain how Verizon believes that it can demonstrate that it is operating in a non-discriminatory manner.

REPLY:

See General Objections.

VZ VA #111

ITEM: AT&T 3-29 When Verizon provisions line sharing on a line that is already used to provide voice service, when does Verizon perform the physical work that results in a service interruption? More specifically, state whether such work is performed in off hour tours (e.g., midnight to 6:00 am). If the answer differs depending whether VADI or other carriers are involved describe in detail all such differences.

REPLY: See General Objections.

VZ VA #112

- ITEM: AT&T 3-30 Describe in detail all operational differences that exist in a voice service configuration in the following circumstances:
- (A) a loop UNE and switch port UNE are combined by Verizon or
 - (B) a loop UNE and switch port UNE are combined, within CLEC collocation, using a CLEC-provided ANSI compliant splitter.
 - (C) If Verizon claims that there are any differences with respect to the ability to test or maintain the configuration combined within CLEC collocation, separately provide the maintenance results that Verizon routinely collects for retail service for which (a) Verizon provides only basic local service over local loops and (b) Verizon engages in line sharing. Such measures should include, but not be limited to, initial trouble reports (within the first 7 or 30 days, or whatever other interval Verizon employs); repeat trouble rates; overall trouble rate; mean times to repair; percent out of service >24 hours (non service affecting); and percent out of service >24 hours (service affecting).
 - (D) To the extent Verizon claims there is a difference between results for the UNE-P configuration and the loop/port combination established within CLEC collocation, please provide the analysis, work papers and conclusions of the statistical analysis that demonstrates the existence of a statically significant difference. Please state the alpha error of all such analyses.

REPLY: See General Objections.

VZ VA #113

ITEM: AT&T 3-3 1 Verizon states that a CLEC may “replace” its UNE-P with a loop and port combination created within the CLEC’s collocation. When such a “replacement” occurs describe any implications the change may have for the pre-existing voice service. In particular, please address in detail any implications for:

- (A) Applicable charges, whether recurring or non-recurring and the cost justification for each.
- (B) Potential disruption to the pre-existing service configuration including, but not limited to, 911 data base listing, directory listing, DA listings, the customer service record, and ownership indicators for the line in maintenance databases and
- (C) Any differences between the support offered for voice services under such arrangements and voice service offered as part of a line sharing arrangement.

REPLY: See General Objections.

VZ VA #114

ITEM: AT&T 3-32 Assuming that all results of the New York collaborative addressing line spitting are accepted for implementation in Virginia, what specific additional requirements must be defined or operational issues resolved before carriers may engage in line splitting within the operating territory of Verizon in Virginia?

REPLY: See General Objections.

VZ VA #115

ITEM: AT&T 3-33 Does Verizon anticipate that any capacity constraints for its processes, whether mechanized or manual, are likely to arise with respect to implementation? If not, please explain why not. If so, in what way and at what levels will capacity potentially be limited?

(A) What steps has Verizon taken to alleviate any concerns that it may have with respect to capacity limitations resulting from line splitting and when will these steps be fully implemented? Once fully implemented will all capacity constraints be addressed?

REPLY: See General Objections.

VZ VA #116

ITEM: AT&T 3-34 What level of flow through (defined as the proportion of line splitting provisioning orders that do not require human intervention from the point of successful submission by the requesting CLEC to the point of dispatch of a central office technician to perform work) is projected for Verizon within Virginia? When is the 100% flow through planned to be made available to CLECs? If 100% flow-through is not anticipated, what are the reason(s) for the orders not processing without human intervention?

REPLY: See General Objections.

VZ VA #117

ITEM: AT&T 3-35 Within Verizon-Virginia's operating territory, can a requesting carrier establish new service in a line splitting configuration for which Verizon provides the loop and switch port for the voice portion of the service by submitting of a single order to Verizon? If not, specify the number of orders that will be required and explain why more than a single order is required.

REPLY: See General Objections.

VZ VA #118

ITEM: AT&T 3-36 Within Verizon's operating territory, excluding Virginia, will a requesting carrier seeking to establish new service in a line splitting configuration where Verizon provides the loop and switch port for the voice portion of the service be able to do so through the submission of a single order to Verizon? If not, specify the number of orders that will be required and explain why more than a single order is required.

REPLY: See General Objections.

VZ VA #119

ITEM: AT&T 3-37 Is Verizon currently in the process of examining its loop plant in Virginia to determine its ability to support DSL services for Verizon customers?

- (A) If not, does it have plans to do so and if such plans exist, when will the undertaking start and when is it expected to complete.
- (B) If Verizon is in the process of such an examination, please provide a status report on Verizon's survey of its existing loop plant to create a database of xDSL qualified loops. In particular, please state:
 - (i) when the survey began,
 - (ii) the information being collected in the survey,
 - (iii) the current state of completion of the survey, and
 - (iv) when Verizon expects to complete the survey for Virginia and the other states in the Verizon footprint.
- (C) Please state whether the survey referenced in 42(B) includes information for offices in former GTE territories within Virginia, and if not, how Verizon intends to comply with its obligations to provide loop makeup data for those areas.

REPLY: See General Objections.

VZ VA #120

ITEM: AT&T 3-38 Is Verizon currently in the process of examining its loop plant in the Verizon footprint, excluding Virginia, to determine its ability to support DSL services for Verizon customers?

- (A) If not, does it have plans to do so and if such plans exist, when will the undertaking start and when is it expected to complete.
- (B) If Verizon is in the process of such an examination, please provide a status report on Verizon's survey of its existing loop plant to create a database of xDSL qualified loops. In particular, please state:
 - (i) when the survey began,
 - (ii) the information being collected in the survey,
 - (iii) the current state of completion of the survey, and
 - (iv) when Verizon expects to complete the survey for Virginia and the other states in the Verizon footprint.

REPLY: See General Objections.

VZ VA #121

ITEM: AT&T 3-39 What is the current accuracy rate of Verizon's loop pre-qualification database for its operating territory in Virginia? Specifically, how often does that database indicate a loop is qualified but it is later found not to be qualified when the technician attempts to provision an order? How often is a loop shown as not qualified and later is found to be DSL capable?

REPLY: See General Objections.

VZ VA #122

ITEM: AT&T 3-40 Does Verizon provide any CLEC(s) an electronic copy of the Verizon loop qualification database? If yes, what are the terms and conditions and charges for access to this data? If no, please explain why it is not available, particularly if Verizon asserts any issues of technical infeasibility.

REPLY: See General Objections.

VZ VA #123

ITEM: AT&T 3-41 Does Verizon provide any CLEC(s) with direct electronic access to the underlying data that resides in the Verizon loop qualification database? If yes, what are the terms and conditions and charges for access to this data? If no, please explain why it is not available, particularly if Verizon asserts any issues of technical infeasibility.

REPLY: See General Objections.

VZ VA #124

ITEM: AT&T 3-42 Please state whether Verizon will require AT&T to perform a loop qualification query on each loop over which AT&T intends to provide a DSL service. If so, please state all reasons why Verizon believes such a requirement is necessary.

(A) Would Verizon take a different position if AT&T agreed not to hold Verizon responsible for service problems when AT&T has not pre-qualified a loop and that loop had not been previously qualified by another carrier to provide DSL service? If so, how would Verizon modify its response?

REPLY: See General Objections.

VZ VA #125

ITEM: AT&T 3-43 Verizon states that it “agree[s] that AT&T should not be required to pre-qualify a loop that has already been pre-qualified for the same advanced data service in the same time period (i.e., the loop has been in continuous use for the same service).” In this context, please describe what Verizon means by the terms “same service” and “continuous use.”

REPLY: See General Objections.

VZ VA #126

ITEM: AT&T 3-44 When Verizon processes a loop qualification transaction,

- (A) What specific information does Verizon return to the carrier requesting the loop qualification;
- (B) Does Verizon, in any way, advise the carrier submitting the loop qualification request whether or not a particular DSL will operate satisfactorily? If so, upon what information does Verizon base this judgment?
- (C) Must a carrier identify the nature of the DSL service it intends to provide over a particular loop; if so, how and when in the pre-ordering/ordering process is the information conveyed?

REPLY: See General Objections.

VZ VA #127

ITEM: AT&T 3-45 State the trouble rate for local service loops employed in line sharing for cases where the CLEC did qualify or re-qualify loops? When reporting this result, please provide all detail that is necessary to draw a conclusion whether the difference, if any, is statistically different at varying levels of statistical confidence. Also, please identify the time frame, geographic scope of the service area and number of different carriers represented within the data. If Verizon cannot provide such information, describe the basis upon which it draws the conclusion that if CLECs do not pre-qualify loops, "it will receive unnecessary trouble reports, causing Verizon to operate in an inefficient manner"?

REPLY: See General Objections.

VZ VA #I28

ITEM: AT&T 3-46 State the trouble rate for local service loops employed in line sharing for cases where the CLEC did not qualify or re-qualify loops? When reporting this result, please provide all detail that is necessary to draw a conclusion whether the difference, if any, is statistically different at varying levels of statistical confidence. Also, please identify the time frame, geographic scope of the service area and number of different carriers represented within the data. If Verizon cannot provide such information, describe the basis upon which it draws the conclusion that if CLECs do not pre-qualify loops, "it will receive unnecessary trouble reports, causing Verizon to operate in an inefficient manner"?

REPLY: See General Objections.

VZ VA #129

- ITEM: AT&T 3-47 If a CLEC uses an alternate loop qualification tool (e.g., from a vendor such as Telecordia), would Verizon accept line splitting orders from that CLEC without requiring that Verizon also perform a loop qualification?
- (A) If yes, would the CLEC be required to submit any information to Verizon regarding the results of that carrier's qualification of the loop?
 - (B) If information is required from the carrier, what will Verizon require that the carrier supply and how would the information be provided.
 - (C) If Verizon requires that it perform a loop qualification, despite the CLEC performing its own qualification, why does Verizon believe it needs to perform the re-qualification and what charges, if any, would apply for the re-qualification?

REPLY: See General Objections.

VZ VA #130

ITEM: AT&T 3-48 What is the basis for Verizon's statement that "AT&T would have the Commission require Verizon to place splitters in shared common areas or to permit AT&T to place splitters in any type of collocation"? Where, in AT&T's proposed language, does Verizon assert that AT&T is seeking to require that the collocation in which the splitter is located be established "in any particular place"?

REPLY: See General Objections.

VZ VA #131

ITEM: AT&T 3-49 Does Verizon assert that AT&T, having established collocation space, may not place splitters in such collocation space? If so, what limitations does Verizon assert it may place on CLECs' decisions regarding where to place splitters within its collocation?

REPLY: See General Objections.

VZ VA #132

ITEM: AT&T 3-50 Where Verizon offers to deploy splitters in shared common space for other CLECs, does Verizon assert that it is not obligated to do so for AT&T?

REPLY: See General Objections.

VZ VA #133

ITEM: AT&T 3-5 1 Does Verizon allow VADI to place splitters in any arrangement other than separate physical caged collocation in Virginia or any other state? If so, please specify what options for splitter placement are available to VADI. Are these same arrangements available for other CLECs? If not, please state why not.

REPLY: See General Objections.

VZ VA #134

ITEM: AT&T 3-52 Please define in full the meaning of “packet switching” as Verizon uses the term and the basis upon which Verizon contends that packet switching functionality is provided by a particular piece of equipment.

REPLY: See General Objections.

VZ VA #135

ITEM: AT&T 3-53 Does any equipment that is owned or used by VADI and that is deployed in any Verizon central office or remote terminal in any state within the Verizon footprint currently provide or have the capability to provide packet switching functionality, as Verizon defines the term? If so, please describe such equipment by type and function.

REPLY: See General Objections.

VZ VA #136

ITEM: AT&T 3-54 What, if any, limitations does Verizon place on its “voluntary”
agreement to allow CLECs’ to cross-connect?

REPLY: See General Objections.

VZ VA #137

ITEM: AT&T 3-55 Will Verizon permit CLECs to retain such cross connections pursuant to its "voluntary agreement" if the FCC determines it is not required to do so. If so, on what terms and conditions?

REPLY: See General Objections.

VZ VA #138

ITEM: AT&T 3-56 Where are the ordering and provisioning procedures for establishing CLEC-to-CLEC connections made available to CLECs for use in Virginia? Is direct cabling between CLEC collocations available? If so, please indicate the provisioning methods and procedures. If not, please indicate why not.

REPLY: See General Objections.

VZ VA #139

ITEM: AT&T 3-57 Specifically identify the contract or tariff governing the terms and conditions of such CLEC to CLEC connections and, if not a publicly available document, please provide copies. Please identify when the capability was first made available to CLECs in Virginia.

REPLY: See General Objections.

VZ VA # 140

Respectfully submitted,

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Dated: June 27, 2001

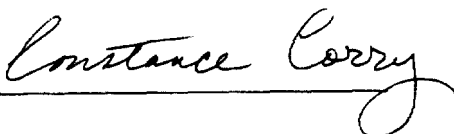
CERTIFICATE OF SERVICE

I do hereby certify that true and accurate copies of the foregoing Objections to AT&T's Third Set of Data Requests were served electronically and by overnight mail this 27th day of June, 2001, to:

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**Before the
Federal Communications Commission
Washington, D.C. 20554**

**In the Matter of
Petition of AT&T Communications
of Virginia, Inc., Pursuant
to Section 252(e)(5) of the
Communications Act, for Preemption
of the Jurisdiction of the Virginia
State Corporation Commission
Regarding Interconnection Disputes
with Verizon-Virginia, Inc.**

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CC Docket No. 00-251

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of July, 2001, a copy of AT&T's Motion to Compel Responses To AT&T's Third Set Of Data Requests From Verizon Virginia, Inc. was sent via overnight delivery and emailed to:

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